

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

2. Pursuant to Federal Bankruptcy Rule 7012, the deadline for the Defendant to file an answer or otherwise respond to the Complaint is August 13, 2020.

3. The Trustee seeks an extension of that deadline for 90 days until October 12, 2020, to allow the Trustee and the Defendant time to potentially resolve the issues without either party incurring attorney's fees and costs of litigation.

WHEREFORE, the Trustee respectfully requests that the Court enter an order extending the answer deadline from August 13, 2020 until October 12, 2020, and for such other and further relief, at law and in equity, as this Court deems just.

Dated: July 17, 2020

Respectfully submitted,

BARRON & NEWBURGER, P.C.

/s/R. J. Shannon

R. J. Shannon (TBA No. 24108062)

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*Special Counsel for Rodney D. Tow, Chapter
7 Trustee for Koontz-Wagner Custom Control
Holdings LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2020, I caused a true and correct copy of the foregoing to be served on the Defendant's Registered Agent by regular first class mail at the following address:

Helping People Succeed, Inc., d/b/a Express Employment Professionals
c/o Janet L. Isaacson
275 S. Main Street, Suite 200
Longmont, CO 80501

/s/R. J. Shannon

R. J. Shannon

